



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

AUG 13 1993

Mr. Gerry Korb
Vice President, Manufacturing
The Knapheide Mfg. Company
P.O. Box C-140
436 South 6th Street
Quincy, Illinois 62306-2140

Dear Mr. Korb:

The Environmental Protection Agency (EPA) has reviewed your revised site audit plan, dated July 2, 1993, which was prepared by the McLaren/Hart Environmental Engineering Corporation (McLaren/Hart). The revised plan was submitted in response to the EPA's June 8, 1993 comments. The revised plan addressed most of EPA's comments, however, some further modification was necessary. These modifications were discussed with Mr. William Lindsey of McLaren/Hart on July 20, 1993, and accepted. The following paragraphs are the concerns discussed with Mr. Lindsey and the modifications to the plan he agreed to make.

1. Section 4.0, Pages 4-5 through 4-8, Compliance Status Assessment.

This comment was partially addressed. The revised plan included a facility map and stated that the environmental audit report would provide a history of all areas of environmental concern (AOEC). The revised plan also stated that the audit team will: (1) photograph all AOEC, (2) indicate all sampling points on a facility map, (3) examine areas around each AOEC for signs of potential releases, and (4) photograph any visible signs of releases.

The revised plan, however, did not state that:

- The audit team must document sample collection procedures, including sample number, location, depth, and method of collection in a bound field logbook.
- The audit team must collect duplicate samples (split samples) at a frequency of at least 10 percent for each media type (e.g., soil, water, air) to assess the precision of the formal analytical laboratory used by the facility.
- The audit team must follow standard sample chain-of-custody procedures.



R00000618
RCRA Records Center



Mr. Lindsey did state that this was an non-intentional omission and that McLaren/Hart would comply with these requirements.

2. Section 4.0, Pages 4-5, Potential Fuel Spill Area/Former Underground Tank Areas.

This comment was partially addressed. The revised plan indicated that no sampling will occur in these areas during the audit, which is acceptable. However, the revised plan did not append reports of previous investigations as requested. Therefore, the EPA requires that the audit team summarize these investigations and include a discussion of them in the environmental audit report. Mr. Lindsey agreed to this change.

3. Section 4.0, Pages 4-5 and 4-6, Fire Pond.

This comment was addressed. The revised plan stated that the audit team will evaluate the fire pond for National Pollutant Discharge Elimination System (NPDES) requirements. The revised plan also stated that the purpose of collecting wastewater samples was to identify opportunities for pollution prevention or pollution reduction. Collection of wastewater samples for this purpose is acceptable.

Although EPA's June 8 comments did not specifically request that the audit team determine if the fire pond could be a regulated surface impoundment subject to the regulations of 40 Code of Federal Regulations Part 265, this determination is necessary before supplemental environmental projects in this area can be proposed. Mr. Lindsey agreed that this activity will be conducted during the audit.

In addition, the EPA maintains that at least one sediment sample be collected from the fire pond for analysis of volatile organic compounds (Method 8240), semi-volatile organic compounds (Method 8270), and metals (Method 6010/7000). If the fire pond is not a regulated surface impoundment, restoration of the fire pond sediments may be a supplemental environmental project.

4. Section 4.0, Page 4-7, Storm Water Ditches.

This comment was partially addressed. Table 5 indicates that five (5) composite samples and two (2) grab samples will be collected from the storm water ditch. If more than one ditch or tributaries to the ditch are identified, the number of samples collected may need to be increased. Mr. Lindsey indicated that there were feed ditches and that he would sample those if necessary.

5. Section 4.0, Page 4-8, Air Emission Sources.

This comment was partially addressed. The revised plan stated that the purpose of collecting the air samples is to evaluate opportunities for pollution prevention or pollution reduction. The revised plan, however, did not state that the audit team will determine whether the collection of ambient air samples inside the building is required under the Occupational Safety and Health Act (OSHA). The revised plan also did not state that the audit team will determine if the collection of samples at the filter outlets of the paint booths is required by the Missouri Department of Natural Resources (MDNR) to obtain air permits. Mr. Lindsey stated that the intended sampling would answer the above questions, therefore, he agreed to the change.

6. Section 4.0, Page 4-8, Interviews.

This comment was partially addressed. The revised plan stated the name and title of the individuals that will be interviewed. Based on the titles of those to be interviewed, none of these individuals appear to have personally conducted paint stripping and maintenance activities. The individuals to be interviewed include the president, vice president, and three managers. EPA requires that the audit team also interview at least one person who has worked on the "floor" for at least ten (10) years and one person who has performed maintenance activities for at least ten (10) years. Mr. Lindsey agreed to the modification for the two (2) additional interviews. I also discussed with Mr. Lindsey procedures he may use to ensure that the employees are fully responsive to his questions and recommend that Knapheide adopt a policy not to punish the employees for any acts concerning environmental activities discovered during the interviews.

7. Section 7.0, Pages 7-1 to 7-3, Cost Estimate/Budget.

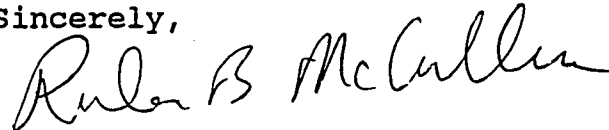
This comment was partially addressed. The cost estimate/budget in the revised plan provides much greater detail than was presented in the May 7 plan. The proportion of time allocated to audit activities versus sampling activities is acceptable.

Table 5 was added to the plan to provide a detailed cost estimate for analytical expenses. The Above Ground Storage Tank Area portion of Table 5 appears to include Geoprobe operators in its total cost. Unless the Geoprobe is operated by a separate contractor or additional McLaren/Hart personnel, this appears to contradict Table 4 in which the labor cost for samplers Sandra Potter and Ben Francka has already been included. Mr. Lindsey clarified this apparent discrepancy by stating that the Geoprobe personnel were McLaren/Hart personnel, but that they did not occur on Table 4.

If these above modifications of the revised audit plan are acceptable to Knapheide, please notify me by telephone within five (5) days of receipt of this letter. Upon that notification, the plan is approved. If the modifications are not acceptable, submit a revised audit plan within ten (10) days of receipt.

The revisions you made to the Closure Plan that we requested have been reviewed. The plan is considered approved for the purpose of the Consent Agreement per the June 7, 1993 letter. If you have any questions concerning either approval, contact me at (913) 551-7455.

Sincerely,



Ruben B. McCullers
Environmental Scientist
RCRA Compliance Section

cc: Ed Sadler, MDNR
Steve Jacks, MDNR
Kelvin Kelly, MDNR
Sandra Oberkfell, Esq.

23
AUG 16 1993

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WSTM/RCRA/RCOM:MCCULLE;it:8/2:lh:X7658:8/10/93:G:KNAPH.APP

RCOM

MCCULLERS

RBM
8/10/93

CNSL

RICHARDS

[Signature]
8/12

RCOM

DOYLE

[Signature]
August 13th, 1993

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Kelvin Kelly, MDNR ✓
Sandra Oberkfell, Esq. ✓

bcc: Nathan Meyer, PRC ✓
Bob Richards, CNSL ✓